
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Write the full name of each plaintiff.

____ CV ____
(Include case number if one has been
assigned)

-against-

COMPLAINT

Do you want a jury trial?

☐ Yes ☐ No

Write the full name of each defendant. If you need more
space, please write "see attached" in the space above and
attach an additional sheet of paper with the full list of
names. The names listed above must be identical to those
contained in Section II.

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

- ☐ **Federal Question**
- ☐ **Diversity of Citizenship**

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

B. If you checked Diversity of Citizenship

1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, _____, is a citizen of the State of
(Plaintiff's name)

(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

_____.

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, _____, is a citizen of the State of
(Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or
subject of the foreign state of

If the defendant is a corporation:

The defendant, _____, is incorporated under the laws of
the State of _____

and has its principal place of business in the State of _____

or is incorporated under the laws of (foreign state) _____

and has its principal place of business in _____.

If more than one defendant is named in the complaint, attach additional pages providing
information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional
pages if needed.

First Name	Middle Initial	Last Name
Street Address		
County, City	State	Zip Code
Telephone Number	Email Address (if available)	

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:

First Name	Last Name	
Current Job Title (or other identifying information)		
Current Work Address (or other address where defendant may be served)		
County, City	State	Zip Code

Defendant 2:

First Name	Last Name	
Current Job Title (or other identifying information)		
Current Work Address (or other address where defendant may be served)		
County, City	State	Zip Code

Defendant 3:

First Name	Last Name	
Current Job Title (or other identifying information)		
Current Work Address (or other address where defendant may be served)		
County, City	State	Zip Code

Defendant 4:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

III. STATEMENT OF CLAIM

Place(s) of occurrence:

Date(s) of occurrence:

FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

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INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

IV. RELIEF

State briefly what money damages or other relief you want the court to order.

FACTS

Plaintiff **Nicole Lawtone-Bowles** was the victim of **fraudulent mortgage servicing and foreclosure practices**, which caused **financial harm, emotional distress, and damage to her credit and property rights**.

In 2004, Plaintiff paid \$81,000 from a **Workers' Compensation Check** to **Steven J. Baum** to pay off her mortgage. However, Baum failed to apply the payment, and the mortgage was never marked as satisfied.

Despite the **loan being paid in full**, Defendants **continued to bill Plaintiff**, and she **continued making payments** to Select Portfolio Servicing (SPS) until she discovered that Baum had **misappropriated her funds** and had been **cited for fraud**.

For **14 years**, Defendants **repeatedly attempted to foreclose** on Plaintiff's home, despite knowing that the **underlying mortgage debt was fraudulent**.

Plaintiff was **forced into legal battles** to fight off these foreclosure efforts. In **2025**, Judge **Sandra B. Sciritino** issued a ruling **upholding a fraudulent foreclosure**, despite **clear evidence of fraud** and the fact that Plaintiff had **filed complaints against the judge for bias** based on her **race (Black) and disability**.

Defendants' Conduct and Harm Caused

1. Steven J. Baum

- Took **\$81,000 from Plaintiff** to satisfy her mortgage but **never applied the payment**.
- Continued to **facilitate foreclosure efforts**, knowing the **loan had been paid off**.
- **Was cited for fraud** but **no corrective action was taken** to restore Plaintiff's property rights.
- **Harm:** Plaintiff **lost \$81,000**, continued **making unnecessary mortgage payments**, and **endured wrongful foreclosure threats for over a decade**.

2. Select Portfolio Servicing (SPS)

- Sent **false mortgage bills to Plaintiff** for years after her loan was paid off.
- Plaintiff **continued making payments** until discovering the **fraudulent activity**.
- **Attempted to foreclose on her home for 14 years**, despite knowing the mortgage was fraudulent.
- **Harm:** Plaintiff **paid money she did not owe**, suffered **financial losses, emotional distress, and the threat of losing her home**.

3. Riyaz G. Bhimani

- Actively **participated in the fraudulent foreclosure process.**
 - **Knowingly misrepresented Plaintiff's mortgage status** and continued legal action based on **false information.**
 - **Harm:** Plaintiff was forced to **fight wrongful foreclosure for over a decade,** leading to **legal expenses, stress, and financial instability.**
4. **Eckert Seamans Cherin & Mellott, LLC**
- **Engaged in legal misconduct** by representing wrongful foreclosure actions.
 - **Failed to verify the accuracy of court documents,** contributing to the **fraudulent foreclosure process.**
 - **Harm:** Plaintiff **incurred legal costs** and **faced continued foreclosure threats.**
5. **U.S. Bank National Association (as Trustee)**
- **Acted as trustee for a mortgage that was already paid in full.**
 - **Failed to verify loan ownership** before **initiating foreclosure proceedings.**
 - **Harm:** Plaintiff endured **years of wrongful foreclosure attempts,** suffered **credit damage,** and faced **financial harm.**
6. **Judge Sandra B. Scritino**
- **Issued a biased ruling on January 6, 2025,** upholding a fraudulent foreclosure.
 - Plaintiff had **previously filed complaints against her for discrimination** based on **race (Black) and disability.**
 - **Harm:** Plaintiff was forced to **continue legal battles** despite **clear evidence of fraud.**

INJURIES

As a result of the Defendants' fraudulent and wrongful foreclosure actions, Plaintiff suffered:

1. **Severe emotional distress,** including **anxiety, depression, and sleep disturbances.**
2. **Financial harm,** including **the loss of \$81,000, continued wrongful mortgage payments, and legal expenses.**
3. **Credit damage,** affecting her ability to **obtain loans or secure housing.**
4. **Physical health issues,** including **stress-related conditions requiring medical treatment.**

Plaintiff has sought **medical treatment for stress, anxiety, and related health issues** caused by the **ongoing wrongful foreclosure and financial strain**.

RELIEF REQUESTED

Plaintiff seeks the following relief from the court:

1. **Monetary damages of \$2,000,000.00** for financial losses, wrongful payments, legal expenses, and emotional distress.
2. **Treble damages under RICO** for Defendants' pattern of fraudulent conduct.
3. **Punitive damages** to deter future fraudulent practices.
4. **A court order declaring the mortgage fully satisfied** and voiding any further foreclosure actions.
5. **Restitution for all improper payments made to SPS** after the loan was paid off.
6. **Expungement of negative credit reporting** related to the fraudulent foreclosure attempts.
7. **Any other relief the court deems just and proper.**

Plaintiff requests that the court hold the Defendants **fully accountable for their fraudulent, deceptive, and discriminatory actions**.

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

_____		_____	
Dated		Plaintiff's Signature	

First Name	Middle Initial	Last Name	

Street Address			

County, City		State	Zip Code

Telephone Number		Email Address (if available)	

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☐ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.